

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

WILLIAM ALSTON
Plaintiff

v.

Civil Action No. 05-168 Erie

DEBORAH FORSYTH, et. al.,
Defendants

MOTION FOR THE APPOINTMENT OF COUNSEL

Plaintiff William Alston, pursuant to §1915, requests this Court appoint counsel to represent him in this case for the following reasons:

1. The Plaintiff is unable to afford counsel.
2. The issues involved in this case are complex to plaintiff.
3. The plaintiff no longer has access to key witnesses.
4. The plaintiff has a limited knowledge of the law.

FILED
APR 20 12:43
CLERK
U.S. DISTRICT COURT
4/17/07
Date

William Alston

William Alston
FCC Petersburg Low
P.O. Box 1000
Petersburg, VA 23804

Zelford Thomas 4/17/07
Zelford Thomas

MY COMMISSION EXPIRES
29 FEBRUARY 2008

IN THE U.S. DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

WILLIAM ALSTON, Plaintiff

v.

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DEBORAH FORSYTH, et. al., Defendants

AFFIDAVIT IN SUPPORT OF THE PLAINTIFF'S MOTION
FOR THE APPOINTMENT OF COUNSEL

WILLIAM ALSTON, being duly sworn, desposes and says:

1. I am the plaintiff in the above entitled case. I make this affidavit in support of my motion for the appointment of counsel.

2. The complaint in this case alleges that the the staff at Federal Correctional Institution McKean, Bradford, PA knowingly exposed plaintiff to hazardous substance/material by knowingly allowing unsafe working conditions. These conditions caused him to suffer significant injuries and also placed plaintiff's future health at risk.

3. The Plaintiff is unable to afford counsel.

4. Plaintiff expects the facts to be strongly disputed by the defendants.

5. Plaintiff has demanded a jury trial.

6. Plaintiff has limited to no knowledge of the law.

7. Plaintiff prepared this complaint with the help of a jail house lawyer.

8. Plaintiff's case will require depositions of witnesses that he can not get to.

9. These facts along with the legal merits of Plaintiff's claims, support the appointment of counsel.

WHEREFORE, the plaintiff's motion for the appointment of counsel should be granted

William Alston

William Alston

Zelford Thomas 4/17/07
Zelford Thomas

RE: Civil Action Number 05-168 Erie

Dear Clerk,

Please Docket my motion for the appointment of
Counsel

Thanking You in Advance
William Alston
07273-016

CC

Laura S. Irvin Esq

US Attorney's Office

File